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7 **UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 MARIAN POENARU,

12 Defendant.

Case No. 2:21-cr-301-APG-NJK

**CRIMINAL INFORMAIION**

for violation of:

Conspiracy to Possess Counterfeit and  
Unauthorized Access Devices (18 U.S.C.  
§ 1029(b)(2))

Aggravated Identity Theft (18 U.S.C.  
§ 1028A(a)(1))

14 THE UNITED STATES ATTORNEY CHARGES THAT:

15 COUNT ONE

16 Conspiracy to Possess Counterfeit and Unauthorized Access Devices  
(18 U.S.C. § 1029(b)(2))

17 1. Between on or about April 20, 2020, and on or about April 26, 2021, in the State  
18 and Federal District of Nevada and elsewhere,

19 MARIAN POENARU,

20 defendant herein, did knowingly and willfully conspire and agree with other persons known and  
21 unknown to commit the crime of Possession of Counterfeit and Unauthorized Access Devices in  
22 violation of 18 U.S.C. § 1029(a)(3).

23 2. In furtherance of the conspiracy, on or about April 25 and 26, 2021, POENARU  
24 possessed at least 15 counterfeit cards that were re-encoded using stolen bank account

1 information from 15 different people, said bank account information were obtained using ATM  
2 skimmer devices POENARU and his coconspirators had installed at various ATMs in Las  
3 Vegas, Nevada.

4 3. All in violation of 18 U.S.C. § 1029(b)(2).

5 COUNT TWO  
6 Aggravated Identity Theft  
(18 U.S.C. § 1028A(a)(1))

7 4. On or about April 19, 2021, in the State and Federal District of Nevada,

8 MARIAN POENARU,

9 defendant herein, did knowingly possess and use, without lawful authority, a means of  
10 identification of another person, that is, a counterfeit debit card encoded with the bank account  
11 information, including the debit card number, of an account belonging to C.C., during and in  
12 relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the violation of 18  
13 U.S.C. § 1029(b)(2) described in Count One, knowing that the means of identification belonged  
14 to another actual person, in violation of 18 U.S.C. § 1028A(a)(1).

15 FORFEITURE ALLEGATION  
16 Conspiracy to Possess Counterfeit and Unauthorized Access Devices and  
Aggravated Identity Theft

17 1. The allegations contained in Counts One and Two of this Criminal Information are  
18 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture  
19 pursuant to 18 U.S.C. § 1029(c)(1)(C) and 1029(c)(2).

20 2. Upon conviction of any of the felony offenses charged in Counts One and Two of this  
21 Criminal Information,

22 MARIAN POENARU,  
23  
24

1 defendant herein, shall forfeit to the United States of America, any personal property used or  
2 intended to be used to commit the violations of 18 U.S.C. § 1028A(a)(1) with 1028A(c)(4) and  
3 18 U.S.C. § 1029(a)(3) and 1029(b)(2):

- 4 1. at least 500 counterfeit cards that were re-encoded using stolen bank account  
5 information;
- 6 2. a counterfeit debit card encoded with the bank account information, including the  
7 debit card number, of an account belonging to C.C.;
- 8 3. a blue HP Stream laptop bearing serial number 5CD111NX66;
- 9 4. a silver HP laptop bearing serial number 5CG1083FBK;
- 10 5. a black HP laptop bearing serial number 3T894703WX;
- 11 6. twelve ATM skimmers;
- 12 7. two Point of Sale (POS) Ingenico overlay card skimmers;
- 13 8. pinhole cameras;
- 14 9. electronic parts used to manufacture skimmers; and
- 15 10. a magnetic reader writer that could be used to re-encode payment cards.

16 All pursuant to 18 U.S.C. § 1028A(a)(1) with 1028A(c)(4) and 18 U.S.C. § 1029(a)(3),  
17 1029(b)(2), 1029(c)(1)(C), and 1029(c)(2).

18 DATED this 6th day of April, 2022.

19 CHRISTOPHER CHIOU  
20 Acting United States Attorney

21   
22 JIM W. FANG  
23 Assistant United States Attorney  
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